

By email and overnight mail

January 26, 2004

Mary Cottrell, Secretary
Department of Telecommunications and Energy
Commonwealth of Massachusetts
One South Station, 2nd Floor
Boston, MA 02110

Re: D.T.E. 03-50 – Verizon Performance Assurance Plan

Dear Ms. Cottrell:

WorldCom, Inc. (“MCI”) submits the following letter in lieu of formal comments on the draft request for proposal for the next audit of the Verizon Performance Assurance Plan (“PAP”), which was submitted by Verizon to the Department on November 24, 2003. MCI offers the following comments on the sufficiency of proposed section 2.3 of the draft RFP.

First, under section 2.3 (A), the draft RFP would require the auditor to “[s]elect a statistically valid sample or other appropriate sample that will provide equivalent assurance from the results reported for Massachusetts for the most recent month’s Final Report. The metrics chosen should fairly represent the various major service categories listed above.” MCI has two objections to this proposed requirement. All metrics in the PAP should be checked, not just a sample of them. The four areas of audit examination delineated in section 2.3 (A) should apply to **all** metrics in the Plan. In addition, the audit should look at a representative sample of three or four months of data for each measure. By proposing to limit the time period looked at to one month and only a selected number of metrics, Verizon is significantly improving the chances that problems in Verizon’s performance will not be uncovered.

Next, MCI proposes that an additional requirement be added to section 2.3 (A) with respect to the auditing of Verizon’s performance data for provisioning and maintenance. Specifically, Verizon exclusions for 1) customer not ready, 2) no access for provisioning, and 3) Found OK, Test OK, should be audited by examining the underlying technical documentation to ensure that the exclusion was appropriate.

With respect to section 2.3 (C)(2), the auditing of Verizon’s bill credits should not be limited to an examination of the accuracy of the calculation. The auditor should also be required

to determine whether the credits were paid in a timely manner. In addition, in reviewing for accuracy, each aspect of the plan must be examined to ensure that the credits were computed accurately.

Finally, the auditor should be required to review the results of other PAP audits in other Verizon jurisdictions and to investigate whether any deficiencies identified in those audits are also present in Massachusetts.

Very truly yours,

Richard C. Fipphen

Cc: Joan Foster Evans, Hearing Officer
D.T.E. 03-50 Service List